



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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F. #2014R00236

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 25, 2015

By ECF and Email

James Roth, Esq.  
Stampur & Roth  
299 Broadway Suite 800  
New York, NY 10007

Re:     United States v. Jun Feng  
Crim. No. 14-387 (S-1) (MKB)

Dear Mr. Roth:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the government writes to provide notice of its intention to call at trial Bebita Joseph to provide expert testimony in the field of forensic chemistry.

Ms. Joseph received a Bachelor of Science degree in Chemistry and Psychology from Stony Brook University in 2003. From 2004 through the summer of 2015, she served in the position of Senior Forensic Chemist for the United States Drug Enforcement Administration (“DEA”). Her responsibilities included analyzing evidence and identifying controlled substances. She has been qualified as an expert in forensic chemistry by federal courts in New York, Connecticut and Massachusetts. Her curriculum vitae is attached.

The government anticipates that Ms. Joseph will testify that she examined the narcotics evidence recovered in connection with the undercover purchases of narcotics made on February 27, 2014 and April 17, 2014, as well as the narcotics evidence recovered in connection with the search of the defendant’s residence on July 7, 2014. Ms. Joseph will testify that she made findings concerning the chemical composition, gross weight, and net weight of the recovered narcotics.

The laboratory report detailing Ms. Joseph’s findings as to the substances seized in connection with the February 27, 2014 transaction was previously produced to you on September 4, 2014 at Bates number GOV-JUNFENG-04833. The laboratory report related to the substances seized in connection with the April 17, 2014 transaction was produced to you via email on November 21, 2014. The reports pertaining to the substances seized from the defendant’s residence were produced to you on July 29, 2015 at Bates

numbers GOV-JUNFENG4912-18. As set forth in those reports, Ms. Joseph determined that the substances seized on February 27, 2014 and April 17, 2014 were methamphetamine, and that the substances seized from the defendant's apartment were methamphetamine, marijuana and cocaine.

The government reserves the right to call substitute expert witnesses as well as to call additional expert witnesses, and will provide advance notice of any intent to do so. If you have any questions or requests, please do not hesitate to contact us.

Respectfully submitted,

ROBERT L. CAPERS  
United States Attorney

By: /s/ Lauren Howard Elbert  
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